4242 MERRICK ROAD, MASSAPEQUA, NEW YORK 11758

NEIL H. GREENBERG, ESQ.

CATALINA ROMAN

JUSTIN M. REILLY, ESQ.

PARALEGAL

HEATHER BABIONE, ESQ.

August 15, 2016

VIA: ECF filing

Honorable A. Kathleen Tomlinson United States Magistrate Judge United States District Court Eastern District of New York 100 Federal Plaza Central Islip, New York 11722-9014

RE: Drouillard v. Sprint Corporation 16 CV 624 (ADS)(AKT)

Dear Judge Tomlinson:

Kindly accept this correspondence as the parties' joint request for an extension of time to file their letter agreement regarding the production of "ESI" in this case.

The Court's Civil Conference Minute Order [D.E. 18] directs the parties to file a written letter agreement by August 15, 2016 setting forth the procedure for the production of "ESI."

The parties, through their counsel, have had discussions concerning the parameters of "ESI" discovery, but have not yet reached a final written agreement as to the manner in which it will be produced.

The parties have a mediation scheduled for August 29, 2016 and have begun to devote their time toward preparing mediation statements and damages charts.

Thus, the parties respectfully request until September 6, 2016 to file their written agreement regarding the production of "ESI" discovery.

This is the first request for an extension of time to file this agreement and all parties consent to the granting of this application.

No other dates in the Court's scheduling order are affected by this request.

PHONE: 516.228.5100 FAX: 516.228.5106 INFO@NHGLAW.COM

WWW.NHGLAW.COM WWW.NEWYORKOVERTIMELAW.COM

Thank you for your time and attention to this matter.

Yours truly,

Justin M. Reilly

cc: Harris M. Mufson, Esq.